REMARKS

Claims 1, 5-6 and 8-22 are pending in the application. Claims 1 and 19-20 have been amended. Claims 2-3 have been cancelled. Claims 9-18 and 21-22 are withdrawn. Claims 1 and 19 are independent claims. No new matter has been added by this amendment.

Applicants respectfully submit that the present application is now in condition for allowance. Accordingly, reconsideration and allowance of the present application are respectfully requested.

Claim Amendments

Independent claim 1 has been amended to recite the subject matter of original dependent claim 3.

Independent claim 19 and dependent claim 20 have also been amended. Support for the amendment to independent claim 19 is found, for example, at FIG. 3. Support for the amendment to dependent claim 20 is also found, for example, at FIG. 3.

No new matter has been added.

Claim Rejections – 35 U.S.C. §102(e)

The Office Action rejects claims 1-3, 5-6, 8 and 19-20 as being anticipated by U.S. Patent No. 6,469,494 ("Cuevas").

Reconsideration and withdrawal of the rejections are respectfully requested.

Claim_1

Independent claim 1 has been amended to recite the subject matter of original dependent claim 3.

Independent claim 1 now recites an apparatus that includes a plurality of pliant conductive elements, a first end of one of the plurality of pliant conductive elements to be electrically coupled to a first electrical contact of an integrated circuit substrate and a second end of the one of the plurality of pliant conductive elements to be electrically coupled to a second electrical contact of an integrated circuit die. The apparatus further includes a pliant material in which the plurality of pliant conductive elements are disposed. The pliant material includes a pliant dielectric material.

Cuevas does not teach or suggest the apparatus of independent claim 1.

Cuevas discloses a programmable connector 20 that includes an insulating substrate 26 and an array of programming regions 30 (col. 3, lines 50-53). Each programming region 30 includes a conductive portion 34, a conductive portion 42 and a support region 62 (col. 3, lines 54-59). The operator activates a programming region 30 by using a pliant conductive material, such as a solution dispensed in the form of an "ink" from a "pen," or pen-type device, to "write" a layer of material, shown in the form of a circle, or dot 50, over support region 62 of programming region 30 in FIG. 5 (col. 4, lines 42-47).

However, Cuevas does not teach or suggest an apparatus that includes the combination of (1) a plurality of pliant conductive elements, a first end of one of the plurality of pliant conductive elements to be electrically coupled to a first electrical contact of an integrated circuit substrate, a second end of the one of the plurality of pliant conductive elements to be electrically coupled to a second electrical contact of an integrated circuit die, and (2) a pliant material in which the plurality of pliant conductive elements are disposed, wherein the pliant material includes a pliant dielectric material, as recited in independent claim 1.

Notably, although Cuevas discloses a type of pliant conductive material, i.e., a solution dispensed in the form of an "ink" from a "pen," or pen-type device, to "write" a layer of material,

shown in the form of a circle, or dot 50, no portion of such pliant conductive material appears to be disposed <u>in</u> a pliant material that comprises a pliant dielectric material. In that regard, the pliant conductive material is disposed over, not <u>in</u>, the support region 62. Consequently, even if the support region 62 constitutes a type of pliant material, as asserted in the Office Action¹, and even if the pliant conductive material (i.e., the solution dispensed in the form of an "ink" from a "pen," or pen-type device, to "write" a layer of material, shown in the form of a circle, or dot 50) constitutes a pliant conductive element, as asserted in the Office Action, such pliant conductive element is not disposed <u>in</u> the asserted pliant material. As stated above, the pliant conductive material is disposed over, not <u>in</u>, the support region 62.

Thus, Cuevas does not teach or suggest the apparatus of independent claim 1.

Independent claim 1 should therefore be allowed.

Claim 19

Amended independent claim 19 recites a device comprising an integrated circuit die comprising a first plurality of electrical contacts, an integrated circuit substrate comprising a second plurality of electrical contacts, and an interconnect patch comprising a plurality of pliant conductive elements. A first end of one of the plurality of pliant conductive elements is in physical contact with one of the first plurality of electrical contacts. A second end of the one of the plurality of pliant conductive elements is in physical contact with one of the second plurality of electrical contacts.

Cuevas does not teach or suggest the device of Claim 19.

¹ The Office Action asserts that the support region 62 is a pliant material made by a dielectric material. Because the reasons set forth herein are sufficient to overcome the rejection, Applicants do not address such assertion. Nonetheless, Applicant reserves the right to address such assertion in any future paper and/or proceeding.

Indeed, Cuevas does not teach or suggest a device that includes the combination of (1) an integrated circuit die comprising a first plurality of electrical contacts, (2) an integrated circuit substrate comprising a second plurality of electrical contacts, and (3) an interconnect patch comprising a plurality of pliant conductive elements, wherein a first end of one of the plurality of pliant conductive elements is <u>in physical contact</u> with one of the first plurality of electrical contacts and a second end of the one of the plurality of pliant conductive elements is in physical contact with one of the second plurality of electrical contacts, as recited in independent claim 19.

Notably, neither conductive portion 34 nor conductive portion 42 constitutes an electrical contact of an integrated circuit die. Therefore, even if the conductive material (i.e., the solution dispensed in the form of an "ink" from a "pen," or pen-type device, to "write" a layer of material, shown in the form of a circle, or dot 50) constitutes a pliant conductive element, as asserted in the Office Action, such pliant conductive element is not in physical contact with an electrical contact of an integrated circuit die. As stated above, neither conductive portion 34 nor conductive portion 42 constitutes an electrical contact of an integrated circuit die.

Thus, Cuevas does not teach or suggest the device of independent claim 19.

Independent claim 19 should therefore be allowed.

Dependent claims

Claims 5-6 and 8 depend from independent claim 1 and therefore should be allowed for at least the reasons set forth above with respect to independent claim 1.

Claim 20 depends from independent claim 19 and therefore should be allowed for at least the reasons set forth above with respect to independent claim 19.

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Amendment and Response to September 20, 2006 Non-Final Office Action

CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that the present

application is in condition for allowance. Accordingly, reconsideration and allowance of the

present application are respectfully requested.

Because the reasons set forth above are sufficient to overcome the rejections set forth in

the outstanding Office Action, Applicants do not address some of the assertions set forth therein

and/or other possible reasons for overcoming the rejections. Nonetheless, Applicants reserve the

right to address such assertions and/or to present other possible reasons for overcoming the

rejections in any future paper and/or proceeding.

If the Examiner believes that a telephone interview would expedite the prosecution of this

application in any way, the Examiner is cordially requested to contact the undersigned via

telephone at (203) 972-0006, ext. 1014.

Respectfully submitted,

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Date

Mark Steinberg

Registration No. 40,829

Buckley, Maschoff & Talwalkar LLC

Attorneys for Intel Corporation

50 Locust Avenue

New Canaan, CT 06840

(203) 972-0006, ext. 1014

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